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October 9, 2014

APPLICATION GRANTED
SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 10/14/2014

Honorable Vernon S Broderick
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Oral argument is hereby adjourned to December 3, 2014 at 11:45 a.m. The parties are directed to address, in their November 26, 2014 status letter, whether the Court is permitted to enter a consent order in light of *D. H Blair & Co. v. Gottdiener*, 462 F. 3d 95 (2d Cir. 2006).

Re: *World GTL Inc. and World GTL St. Lucia Ltd. v. Petroleum Company of Trinidad and Tobago Ltd.*, 10-cv-01542 (VSB); *Petroleum Company of Trinidad and Tobago Limited v. World GTL Inc. and World GTL of St. Lucia Ltd.*, 14-cv-04652

Dear Judge Broderick:

We write on behalf of counsel for all parties in the above-captioned, related cases.

This Court has ordered an update concerning the status of proposed stipulations and consent orders that would resolve these actions.

Counsel for the parties have been in active discussion with each other and with their respective clients over the past few months. Although several issues remain, we have identified a possible basis in principle for reaching a mutually agreeable resolution of these cases that would include the submission of stipulations and orders agreed to by the parties. We believe that we can either reach agreement on these issues or conclude that we will not be able to do so within the next 45 days.

Therefore, we respectfully propose the following the schedule for the Court's consideration:

1. The parties will submit a joint report on the status of their negotiations and whether the cases have been resolved on or before Wednesday, November 26, 2014. In the event that the negotiations have not been successful, counsel for each of the parties will submit a letter addressing the Court's question with respect to Second Circuit's Opinion in *D. H. Blair & Co. v. Gottdiener*, 462 F. 3d 95, 109 (2d Cir. 2006).

2. The Court will adjourn oral arguments in this case from October 22, 2014 to the earliest convenient date after December 1, 2014.

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Counsel for both parties understand that they must work diligently if they are to resolve these outstanding issues and secure their respective parties' consent for a resolution. The additional time will afford them the ability to focus their clients' attention on these issues and attempt to reach a resolution that will save the parties and the Court from the expenditure of further time and expense.

If this proposed schedule is not acceptable, we wish to notify the Court that counsel for WGTL will be halfway through a long-planned business trip to the Far East (Tokyo and Jakarta) on October 22. There is unfortunately no one else representing WGTL at this time who could replace counsel for WGTL at oral argument. Accordingly, failing the adjournment requested in this letter, counsel for WGTL would respectfully request an adjournment of oral argument until the week of November 3 (counsel is due to return on November 1).

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, stylized 'C' followed by a horizontal line extending to the right.

Paul H. Cohen

PHC:mg

cc: L. Benno Kimmelman, Esq.
Dana C. MacGrath, Esq.
Kenneth B. Meyer, Esq.